



Alameda County Employees' Retirement Association  
Internal Audit Department

## Security Access Audit

### Report Date: June 2013

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**INTERNAL AUDIT DEPARTMENT**

**REPORT PREPARED FOR:**  
**ACERA BOARD OF RETIREMENT**

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## CONTROL SUMMARY

### KEY CONTROLS

#	Control	Risk Level	Effectiveness
1	<b>Documented Security Access Policy and procedures exist and are consistently followed:</b> This control determines if the current policy and procedures protect the safety of ACERA's staff and access to confidential information.	Medium	Partially Effective
2	<b>ACERA monitors issued and unissued key cards:</b> The purpose of this control is to determine if ACERA properly grants, monitors and deactivates key card (badge) access to prevent unauthorized entry to ACERA's premises.	High	In Remediation
3	<b>Staff responsible for distributing non-employee key cards are fully trained:</b> The purpose of this control is to determine if staff responsible for distributing temporary badges to employees and non-employees are knowledgeable of the badging process.	High	Partially Effective
4	<b>Proper authorization exists for all personnel who are issued key cards:</b> This control confirms that only personnel in good standing or approved third-parties can enter ACERA's secured premises. It also confirms whether badges are returned or deactivated in a timely manner.	High	Partially Effective
5	<b>Physical controls for organizational security are operating effectively:</b> Key physical controls within ACERA's premises are operating effectively to provide a secure working environment.	High	In Remediation

## RISK LEVEL

### **High Risk Controls:**

Controls associated with critical processes within an organization. Typically they are associated with overall monitoring controls or valued in key or numerous processes. They can be controls that had significant findings in previous years. A high risk control failing could result in a material weakness. Material weakness includes material misstatements in the financial statements, significant process errors and misuse of ACERA resources.

### **Medium Risk Controls:**

Controls associated with important processes within an organization, where a deficiency in the control could cause financial loss or breakdown in process, but in most cases do not lead to a critical systemic failure. Typically, these controls had minimal or no findings in previous years, but are integral to the process and necessary to test on a regular basis. A medium risk control failing could result in a significant deficiency, and in some instances, a material weakness. Significant deficiencies can include staff competency, lack of consistent business process and poor utilization of ACERA resources.

### **Low Risk Controls:**

Controls associated with process optimization and non-critical processes. Typically they represent controls that did not have findings in the previous year's testing and have not changed in how they operate or in the personnel performing the controls. Low risk controls are inherent in the current control environment, but are unlikely to cause a material misstatement, unless there is a failure of several low risk controls within the same process.

## CONTROL EFFECTIVENESS

### **Effective:**

The control is fully operating as designed.

### **Partially Effective:**

The control is operating as designed with modification necessary due to a change in business process, change in personnel, inadequate documentation, the control has not been fully implemented, or the control requires additional enhancements to be effective. Often new controls will fall in this category.

### **Improvement Opportunity:**

The control is only marginally effective and should be redesigned or implemented. Typically these controls require review due to an ineffective design, which will prevent the control from detecting control risk.

### **Ineffective:**

The control is not operating as designed, and could lead to a significant risk to the organization, if not remediated.

### **Remediated/In Remediation:**

The control was previously ineffective, partially effective, or an improvement opportunity. A remediation plan is in place to correct the deficiency. Note that reliance can be placed on the remediated control, once retested by internal audit, which typically occurs in the following audit cycle.

## EXECUTIVE SUMMARY

Security impacts an organization's control environment. Security involves establishing or maintaining a sufficient degree of safety in work structures and processes. The information in this audit report points out that a weakness in any layer of security can reduce the overall effectiveness of controls established to prevent unauthorized access.

ACERA is located in Oakland, California, a highly visible metropolitan area. With ACERA's proximity to City Hall and other state and federal agencies, there is a higher exposure to riots and demonstrations (e.g. May Day, Occupy Oakland Movement). ACERA has taken extra measures to provide safety and security for staff. For example, the PRISM Department manages a badge entry process to allow only authorized individuals to gain entry access to ACERA premises; the Human Resources Department has created documentation on Workplace Violence and Emergency Response to inform employees on procedures to follow in an emergency situation during normal operations. The organization has also installed physical controls such as security cameras and duress systems.

ACERA has also established a Crisis Management Team (CMT), which has proven to provide strong communication to staff, members, vendors and the Board of Retirement in the event of a potential threat. We found this team to be effective in providing effective management action to avert potential threats to the workplace in the face of civil unrest. The creation of this team which includes all Senior Management and key staff clearly indicates ACERA's dedication to ensuring safety in the workplace.

To deal effectively in a crisis, the CMT has developed a Crisis Management Plan which details the roles and responsibilities and how the organization would respond. The objectives of the Crisis Management Plan are as follows:

- ✚ Organization
- ✚ Communications and Information
- ✚ Decision Making
- ✚ Response Operations
- ✚ Recovery Operations

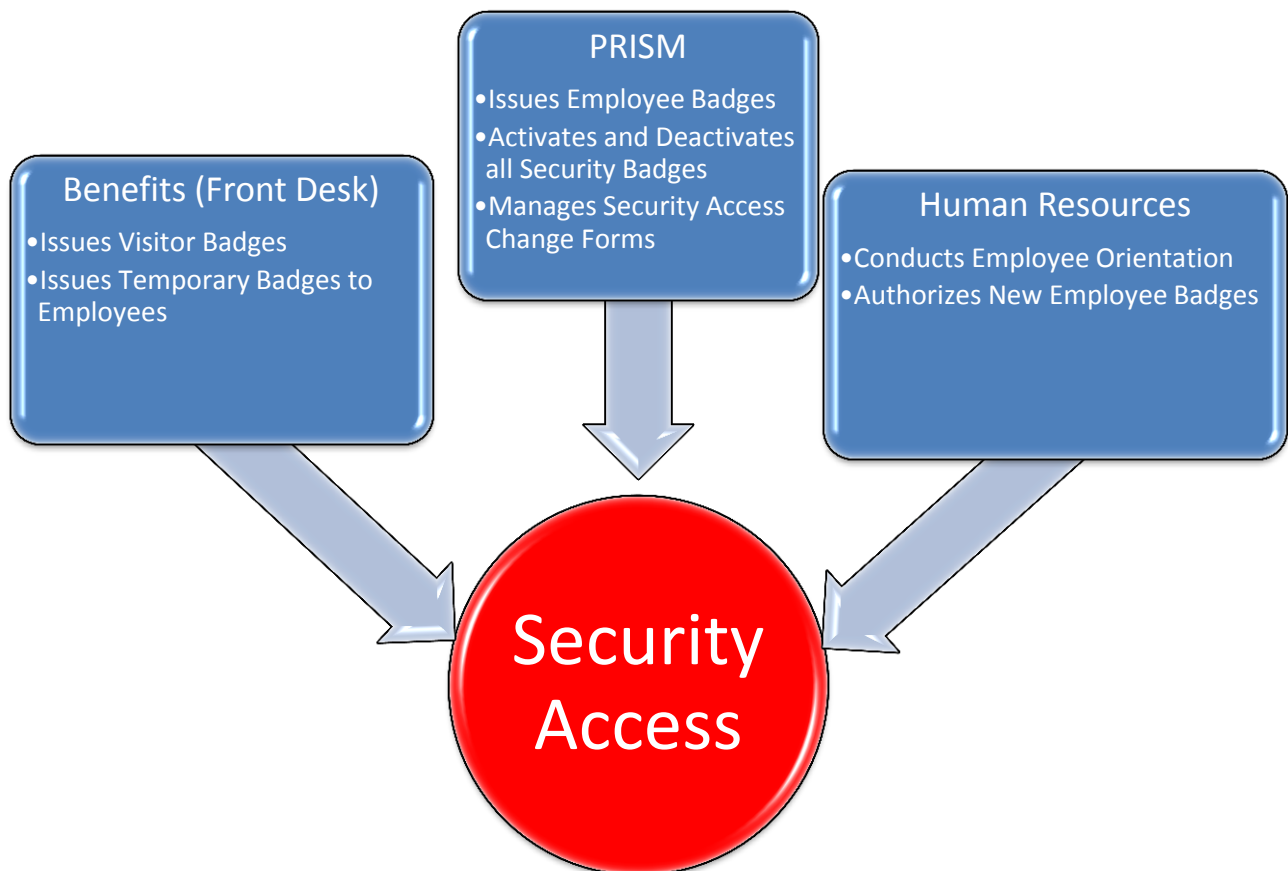
This plan represents ACERA's Crisis Management and Business Recovery Plans. It provides management structure, key responsibilities, emergency assignments, and general procedures for staff to follow during and immediately after an emergency. ACERA established this plan to address the immediate requirements in a major disaster or emergency when normal operations may be interrupted and special measures must be taken to:

- ✚ Save and protect the lives of employees and guests
- ✚ Manage immediate communications and information regarding emergency response operations

- ✚ Provide essential services and operations
- ✚ Provide and analyze information to support decision-making and action plans
- ✚ Manage ACERA resources effectively in the emergency response
- ✚ Ensure that ACERA will continue to meet and support members, retirees and employer's needs and expectations.

During the audit, we met with the Benefits, Human Resources, and Project Information Services Management (PRISM) Departments, along with CBRE (building management), to gain an understanding of ACERA's physical security protocols. We also inquired about how ACERA manages and monitors access to the floors occupied by ACERA employees. This includes the safety of members and visitors, and what emergency procedures are in place in the event of a security crisis. We found that together with CBRE, each of the departments previously mentioned, play a key role in maintaining ACERA's security.

The following diagram represents a high level view of each department's responsibility:



We noted that ACERA implemented a shared structure with no primary coordinator or owner for the overall security process. Instead, the model supports overall security managed through coordination among the Benefits Department (supervises front desk personnel and security in the counseling rooms), PRISM Department (responsible for

activating and deactivating badges and door access; and reviewing the security cameras), and the Human Resources Department (authorizes new employee badges and manages the workplace violence policy, closely coordinating with Alameda County and the Legal Department).

## **AUDIT OBJECTIVE**

The objective of this audit is to provide assurance to Senior Management and the Board of Retirement that the internal controls for physical security and access badges are adequately designed to provide sufficient security for organizational personnel. This audit primarily examined security on ACERA's premise including a high-level perspective of the overall building security.

## **SCOPE AND STRATEGY**

The Security Access Audit is an operational audit that evaluated key controls for badge access and the organization's physical security. This audit examined ACERA's preventive, operational and detective controls for security access. The audit scope examined the period of January 1, 2012 through April 24, 2013.

The scope of the Security Access Audit consisted of examining specific physical security controls and the process for badge issuance, monitoring and deactivation to ensure safety of ACERA's staff and assets. Security badges are used to control entry access to ACERA premises. PRISM monitors badge privileges and information using the C-Cure Event Management System (ACERA's Badge Access Database).

Each individual's badge access is configured based on the granted authorization level and requirements to access the building. As part of the audit, we also tested ACERA's policies and procedures on security for consistency. The Security Policy provides managers with the ability to grant access based on the department's needs. The policies and procedures are in the process of being established to safeguard facilities and personnel from threats of danger.

In the first quarter of 2013, the Internal Audit Department conducted an organization-wide Security Access Survey. The reason for the survey was to obtain staff's opinion on areas of concern and/or suggestions to improve the safety of employees and the security of ACERA. The survey consisted of questions which addressed several key safety and security issues related to ACERA.

The Internal Audit Department sent the online Security Access Survey via email to ACERA's staff. The 2 ½ weeks survey ended on April 24, 2013. The survey was directed to all ACERA employees (staff and management) and received a high response rate of 70%. A summarization of the actual survey data is located in the Appendix.



## AUDIT LIMITATIONS

Badges are issued to the PRISM Department by Building Management. The PRISM Department uses Badge Access Database software for the issuance and deactivation of security badges. This security system is maintained by PRISM – Communication Support Services. Internal Audit does not have user privileges for the Badge Access Database, and therefore relied on system reports provided by the PRISM Department. Typically when an employee loses his or her badge, the employee submits a lost badge form that is tracked. We did not test lost badge forms for 2012 because the PRISM Department reported that there were no lost badges in 2012.

Since the Security Access Audit only evaluated organizational security access related to ACERA, we only examined security access for 10<sup>th</sup>, 11<sup>th</sup> and 12<sup>th</sup> (partial) floors. The 12<sup>th</sup> floor is shared with another building tenant. Please note that we did not examine building security on additional floors. We did inquire with Building Management about the general building security, but we did not examine security outside of ACERA's premises. Further, the audit was limited to physical security only, and did not review logical and privileged access to IT systems and programs, protection of intellectual property or security of member records.

The internal audit staff are not security experts and the audit was limited to areas that the Internal Audit Department deemed the highest risk to the organization. Accordingly, the department does not assume responsibility or guarantee the safety of the organization. Furthermore, although the results of the Security Access Audit will be used to improve the overall security at ACERA, the audit recommendations alone do not ensure the security of ACERA's staff, members, contractors and visitors.

## INSTITUTE OF INTERNAL AUDITORS (IIA) AUDIT GUIDANCE AND STANDARDS

Internal auditing is conducted in diverse legal and cultural environments; within organizations that vary in purpose, size, complexity, and structure; and by persons within or outside the organization. While differences may affect the practice of internal auditing in each environment, conformance with The IIA's *International Standards for the Professional Practice of Internal Auditing (Standards)* is essential in meeting the responsibilities of internal auditors and the internal audit activity.

If internal auditors or the internal audit activity is prohibited by law or regulation from conformance with certain parts of the *Standards*, conformance with all other parts of the *Standards* and appropriate disclosures are needed.

If the *Standards* are used in conjunction with standards issued by other authoritative bodies, internal audit communications may also cite the use of other standards, as appropriate. In such a case, if inconsistencies exist between the *Standards* and other



standards, internal auditors and the internal audit activity must conform to the *Standards*, and may conform with the other standards if they are more restrictive. The purpose of the *Standards* is to:

- (1) Delineate basic principles that represent the practice of internal auditing.
- (2) Provide a framework for performing and promoting a broad range of value-added internal auditing.
- (3) Establish the basis for the evaluation of internal audit performance.
- (4) Foster improved organizational processes and operations.

The *Standards* are principles-focused, mandatory requirements consisting of:

- (1) Statements of basic requirements for the professional practice of internal auditing and for evaluating the effectiveness of performance, which are internationally applicable at organizational and individual levels.
- (2) Interpretations, which clarify terms or concepts within the Statements. The Standards employ terms that are specific. Specifically, the Standards use the word "must" to specify an unconditional requirement and the word "should" where conformance is expected unless, when applying professional judgment, circumstances justify deviation. It is necessary to consider the Statements and their Interpretations as well as the specific meanings from the Glossary to understand and apply the Standards correctly.
- (3) The structure of the *Standards* is divided between Attribute and Performance Standards. Attribute Standards address the attributes of organizations and individuals performing internal auditing. The Performance Standards describe the nature of internal auditing and provide quality criteria against which the performance of these services can be measured. The Attribute and Performance Standards are also provided to apply to all internal audit services.

Assurance services involve the internal auditor's objective assessment of evidence to provide an independent opinion or conclusions regarding an entity, operation, function, process, system, or other subject matter. The nature and scope of the assurance engagement are determined by the internal auditor. There are generally three parties involved in assurance services:

- (1) The person or group directly involved with the entity, operation, function, process, system, or other subject matter - the process owner
- (2) The person or group making the assessment - the internal auditor
- (3) The person or group using the assessment - the user.

Consulting services are advisory in nature, and are generally performed at the specific request of an engagement client. The nature and scope of the consulting engagement are subject to agreement with the engagement client. Consulting services generally involve two parties:

- (1) The person or group offering the advice - the internal auditor

(2) The person or group seeking and receiving the advice - the engagement client.

Consulting services are advisory in nature, and are generally performed at the specific request of an engagement client. The nature and scope of the consulting engagement are subject to agreement with the engagement client. Finally, the Internal Audit Department personnel are not trained or qualified to offer recommendations on legal, actuarial or investment matters. Any questions on these issues should be directed to the appropriate ACERA Department and/or qualified consultant. Hence, no part of the Internal Audit Report should be construed as legal, actuarial, or investment advice.

## **CONTROLS TESTED**

### **CONTROL 1 – DOCUMENTED SECURITY ACCESS POLICY AND PROCEDURES EXIST AND ARE CONSISTENTLY FOLLOWED**

**Risk Level - Medium**

**Audit Results – Partially Effective**

**Control:**

This control determines if the current policy and procedures protect the safety of ACERA's staff and access to confidential information.

**Risk:**

The Security Access Policy and associated procedures are not being implemented with the following: 1) preventive security measures for staff and the organization, and 2) safeguarding of assets and operations.

*\*Note that the risk examined in this audit was limited to physical security measures and did not take into account access to IT systems, data privacy, or access to privileged files.*

**Owner:**

Human Resources/PRISM

### **TEST 1: EXISTENCE OF SECURITY POLICIES AND PROCEDURES FOR ACERA**

Internal Audit met with the Benefits, Human Resources, and PRISM Departments to determine if ACERA has security policies in place. During the meeting we were informed that the organization adheres to the following documents to support security policies and procedures:

- WORKPLACE VIOLENCE PREVENTION POLICY FOR ALAMEDA COUNTY
- ACERA'S PHYSICAL ACCESS AND SECURITY BADGE POLICY/PROCEDURES
- ACERA'S EMPLOYEE HANDBOOK
- CBRE TENANT HANDBOOK
- FLOOR WARDEN EMERGENCY PROCEDURE MANUAL
- ACERA WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES

The WORKPLACE VIOLENCE PREVENTION POLICY has been established by Alameda County. ACERA is in the initial stages of preparing WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES to integrate with this Policy. The Employee Handbook is used to advise employees of their obligations with regards to employee badges. In addition, CBRE, provides tenants with a tenant handbook, which includes sections about security; and a Floor Warden Emergency Procedure Manual. We reviewed the CBRE Tenant Handbook as it pertains to the organization's security. The CBRE Tenant Handbook states "the purpose of this book is to provide building guidelines and to bridge the gap between the time of an emergency and the arrival of emergency personnel." CBRE Tenant Handbook does not address specific occupants; it mainly covers overall building security.

Annually, CBRE conducts floor warden training for building tenants. Each floor is required to have two primary and two alternate wardens per floor. If the floor has multiple tenants, the requirement is one warden and one alternate per tenant. During the training the annual Floor Warden Emergency Procedure Manual is distributed to floor wardens. This manual is used by floor wardens and building tenants to assist before and during an emergency. The primary role of floor wardens, as required by California codes, is to facilitate the orderly evacuation of occupants during an emergency. Floor wardens are the first responders in any emergency. We reviewed the Floor Warden Emergency Procedure Manual as it relates to building security.

The WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES was recently finalized, but not yet implemented by the agency.

### **Test Results:**



**Exception 1:** The "Procedure" section of the ACERA PHYSICAL ACCESS AND SECURITY BADGE POLICY states, "When an employee leaves employment with ACERA, the Manager is responsible for collecting the access card and reporting the employee change of status to Communication Services." ACERA had an incident in 2013 where an employee resigned from ACERA and the manager was not aware that the resignation needed to be communicated to PRISM – Communication Support Services. The employee's badge was not deactivated in a timely manner because PRISM was unaware of the employee's resignation.

**Exception 2:** We also examined the "Protocol" section of ACERA PHYSICAL ACCESS AND SECURITY BADGE POLICY and found the terms "a manager" and "ACERA Communication Services" are ambiguous.

**Exception 3:** We reviewed the documentation related to the ACERA WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES. These procedures still have not been finalized; therefore, we are unable to render an opinion on the adequacy of the

documented procedures. We believe there should be a higher priority on completing this document considering that the WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES were initiated in 2011.

Internal Audit met with CBRE and PRISM to discuss the CBRE TENANT HANDBOOK. As part of the overall building security protocol, Building Management encourages tenants to have their own security procedures. CBRE is responsible for overall exterior building security, and security for building lobbies, parking structure and common floors. When external situations occur that require additional safety, Building Management responds appropriately to secure the building. In most instances, the building is locked down and security is increased. To gain access to any floor a security badge is required and elevators are secured to allow only building tenants to access their specific floors.

During our meeting, the property manager recalled only two incidents that resulted in a security breach. The first incident occurred with another tenant. A terminated employee gave their access badge to lobby security. The security person kept the badge at the lobby desk. A suspect later entered the building and stole the badge and used it to access the tenant's floor. The suspect was able to access several confidential files. The second incident occurred in the building's parking garage. An employee's automobile was vandalized. That area of the parking garage did not have surveillance cameras installed. Since this incident, building management has installed additional cameras to include that area of the parking garage.

**Exception 4 (Remediated):** Internal Audit inquired about established security procedures for employees in cases involving active shooters on the premises. The property manager stated that the building does not have a protocol for this specific event. As a result, she would recommend to building management that a protocol be created and incorporated in the annual Warden Training for building tenants. We did note that for the 2013 Annual Warden Training, safety procedures for employees was updated to account for an active shooter on site, and briefly discussed.

## **TEST 2: PERSONNEL ARE IN COMPLIANCE WITH ACERA'S SECURITY POLICIES**

The audit tested Visitors and Vendors section of ACERA's Physical Access and Security Badge Policy. The policy established protocol for ACERA staff members, visitors and vendors.

### **Test Results:**



**Exception 1:** There is no evidence that the ACERA PHYSICAL ACCESS AND SECURITY BADGE POLICY requirements have been recently communicated to staff and/or updated since it was established in September 2002.

**Exception 2:** We also found that there is no standard policy in place which determines which visitors and vendors are escorted and which vendors are granted temporary

visitor badges. Some vendors are able to move throughout ACERA unescorted with a badge, while some are taken to a location (i.e. copy machine) and then left unescorted and without a badge.

**Recommendations:**

In most organizations, sound security policies begin from the top down not from the bottom up. The diagram below depicts the key components in the security infrastructure, emphasizing the importance of security policies starting at the top from the top and working down.



**Recommendation 1:** We recommend that the PHYSICAL ACCESS AND SECURITY BADGE POLICY be reviewed periodically and updated when changes in the current process occur. This policy should be made available on the shared drive and communicated to all staff.

**Recommendation 2:** The language in the PHYSICAL ACCESS AND SECURITY BADGE POLICY states lost badges are to be reported immediately to “a manager or to ACERA Communication Services.” We recommend that the policy states which forms of communication are acceptable. In our opinion, the communication to management should be written and not oral.

**Recommendation 3:** The term “a manager” should be clearly defined in the PHYSICAL ACCESS AND SECURITY BADGE POLICY. The organization has middle and upper management. The reference to “ACERA Communication Services” should be updated to PRISM - Communication Support Services.

**Recommendation 4:** ACERA should update established badging procedures to enable staff to identify all visitors and vendors on site. The PHYSICAL ACCESS AND SECURITY BADGE POLICY should state the guidelines for when a vendor/visitor would require escorting.

**Recommendation 5:** We recommend training for all managers as to the procedure for issuing and changing the status of security badges. This training should include the importance of communication between Department Managers, Human Resources and PRISM and the risk associated with lack of communication.

**Remediation Plans:**

Owner	Remediation Plans	Remediation Date
Human Resources	Informational meetings will take place for all employees on ACERA Workplace Violence and Emergency Situation Procedures.	3 <sup>rd</sup> Qtr 2013
PRISM	PRISM - Communication Support Services (CSS) Unit will update the PHYSICAL ACCESS AND SECURITY BADGE POLICY to include new procedures and clarification of terms. The Policy will be reviewed by CSS every two years and the current version will be forwarded to Human Resources. PRISM will discuss with Human Resources about including the PHYSICAL ACCESS AND SECURITY BADGE POLICY in the employee handbook.	3 <sup>rd</sup> Qtr 2013
PRISM	ACERA has procedures for issuing and changing the status of security badges. The forms are already in place and utilized. As reminder, supervising managers will be sent a list of all badge related forms with instructions on when and how to use the forms.	3 <sup>rd</sup> Qtr 2013

**TEST 3: EXISTENCE OF SECURITY PREVENTIVE TRAINING**

Alameda County mandates management training on Workplace Violence Prevention bi-annually. The County's Training and Education Center is responsible for online training of M-designated employees. ACERA's CEO mandated that non-managerial staff be trained on workplace violence prevention. This training is conducted by ACERA's Legal Department every two years. Prior to 2013, ACERA's Legal Department conducted Workplace Violence Training for staff in 2011.

**Test Results:**



Our tests concluded that ACERA is proactive with implementing training on workplace violence prevention.

## CONTROL 2 – ACERA MONITORS ISSUED AND UNISSUED KEY CARDS

**Risk Level - High**

**Audit Results – In Remediation**

### **Control:**

The purpose of this control is to determine if ACERA properly grants, monitors and deactivates key card (badge) access to prevent unauthorized entry to ACERA's premises.

### **Risk:**

Failure to consistently monitor, and promptly terminate access increases the risk that disgruntled or disloyal former employees, employees on extended leave or visitors could gain access to ACERA's premises with the intent to disrupt operations, obtain information, or cause harm to ACERA's property or staff.

### **Owner:**

PRISM

### **TEST 1: BADGES ACCESS IS PROPERLY ACTIVATED AND DEACTIVATED**

PRISM is responsible for activating and deactivating badge access and coordinating with management to ensure employees are granted the proper access levels. To test this control we reviewed the Cardholder Definition Report which was provided by the PRISM Department. This report lists each badge, and includes who it is assigned to and the access level assigned. We verified with the PRISM Department that their procedures dictate that only one badge can be issued to one staff member. In cases of lost badges, the lost badge is deactivated prior to the new badge being issued. Furthermore, when an employee is out on extended or administrative leave, the employee's badge is deactivated to prevent access to the premises. Therefore, our review included verifying that there was only one badge issued to each staff member, inactive badges had been deactivated and badges were deactivated for staff out on leave (i.e. administrative, long term medical.)

### **Test Results:**



While reviewing the cardholder definition report, we noticed the following discrepancies.

**Exception 1:** With regards to the requirement that there should only be one active badge per staff member. We found that there were two different staff members that had two active badges on the Cardholder Definition Report. PRISM informed Internal Audit that the employees in question only had one badge which was in use at the time. The second badge issued to each employee was destroyed by PRISM, but was not deactivated in the system at the time of the report.



**Exception 2:** With regards to the requirement that badge access should be deactivated for staff out on extended or administrative leave, we found that there are staff members who are currently out on Administrative leave and Maternity leave, that still possess active badges. The badge access for these employees should have been deactivated immediately.

**Exception 3 (Remediated):** We also tested for missing badges that should have a deactivated status. PRISM provided the front desk with temporary visitor and temporary staff badges. The temporary staff badges are issued to employees who have misplaced their security access badge. At the time of this audit, there were four temporary visitor badges and four temporary staff badges that were still active even though they had not been in ACERA's possession prior to 2012. We found no evidence that these badges were reported missing. Subsequently, the missing badges were deactivated.

### **Recommendations:**

**Recommendation 1:** We recommend that PRISM implement a more robust process for monitoring active and deactivated security badges. Currently, badges are activated by the PRISM Department and deactivated only when PRISM has been notified of a lost or damaged badge. Our audit found that there are instances when badges should be deactivated, but are not. We would like to see a more proactive approach to monitoring the security badges. Our recommendation is that PRISM run a Cardholder Definition Report quarterly and reconciles all security access badges.

**Recommendation 2:** We recommend that Senior Management provide a clear definition of what qualifies for extended leave and/or if there is a certain timeframe that would qualify as such. Any special handling of badges for employees on leave should be documented. Since the organization has experienced instances when an employee's badge was not deactivated after the initial leave date, we further recommend that department managers, Human Resources and PRISM better coordinate with one another prior to the leave process. Effective communication between business units will improve the timeliness of badge deactivations for employees on leave. We further recommend that ACERA establishes procedures for the activation and deactivation of employees on leave.

### **Remediation Plans:**

Owner	Remediation Plans	Remediation Date
PRISM	An Outlook task reminder has been set-up to run quarterly Cardholder Definition Reports and a folder in the CSS unit share drive has been created to store the reports.	2 <sup>nd</sup> Qtr 2013

Human Resources/ Senior Management	Senior Management will decide what qualifies as extended leave and the proper procedures for handling employees on extended leave.	3 <sup>rd</sup> Qtr 2013
Human Resources/ PRISM	ACERA has a process for proper handling of employees on leave. As a result of prior issues, supervising managers will be sent a reminder of the leave process and procedures.	3 <sup>rd</sup> Qtr 2013
PRISM	Procedures exist, forms are already in place and utilized for issuing and changing the status of security badges. As a reminder, supervising managers will be sent a list of all badge related forms with instructions on when and how to use the forms.	3 <sup>rd</sup> Qtr 2013
Benefits/ PRISM	CSS will prepare a quarterly reconciliation of all security access badges. This reconciliation should account for any missing active badges.	2nd Qtr 2013

### **CONTROL 3 – STAFF RESPONSIBLE FOR DISTRIBUTING NON-EMPLOYEE KEY CARDS ARE FULLY TRAINED**

**Risk Level - High**

**Audit Results – Partially Effective**

**Control:**

The purpose of this control is to determine if staff responsible for distributing temporary badges to employees and non-employees are knowledgeable of the badging process.

**Risk:**

Failure to provide front desk staff with procedures, adequate training and appropriate communication with regards to issuing temporary visitor and temporary staff badges can result in badges being issued to unauthorized individuals, who should not have access to secure areas. There is also a risk that temporary badges can be issued, but not returned, then used by unauthorized individuals to gain access to ACERA premises at a later date.

**Owner:**

Benefits/PRISM

#### **TEST 1: FRONT DESK STAFF ARE TRAINED TO MANAGE TEMPORARY BADGE ACCESS**

Since the primary front desk staff are members of the Benefits Department, the Benefits Department is primarily responsible for staffing and providing appropriate training regarding proper ACERA protocol on granting access to ACERA's premises. This can be through providing training within the department or coordinating with other departments (e.g. Human Resources, PRISM, and Legal) to provide the appropriate

training. In addition we found staff from other departments which assist at the front desk consist of both permanent and temporary staff. ACERA is responsible for ensuring that all staff covering the front desk are knowledgeable of the process for issuing temporary visitor and temporary staff badges. We inspected the 2012 Temporary Visitor and Temporary Staff Logs for accuracy and compliance. We also reviewed the log to determine if temporary badges were being returned in a timely manner.

### **Test Results:**



**Exception 1 (Remediated):** After reviewing the logs for both Temporary Staff and Temporary Visitor badges, we observed that there were fewer badges being used than the number of badges that PRISM had originally issued to the front desk. Four Temporary Staff badges and four Temporary Visitor badges were missing and had not been logged out or in for the year 2012, yet they were still active. Further, there was no Lost Card Report form for any of those temporary staff badges that were missing.

**Exception 2:** We did not find documented procedures for the front desk discussing the temporary badge process. When we inquired with the PRISM Department, we were informed that they were not tasked to monitor the status of badges for the front desk, since these resources belong to the Benefits Department. According to the PRISM Department, after the badges are given to the receptionist, it is the receptionist's responsibility to notify PRISM of the status of lost or missing badges.

**Exception 3:** The temporary badge logs are not an effective control for the security access badges. The badges and logs are not kept in a secure environment, and there is limited monitoring of staff and vendors as they sign out and return badges. When reviewing the logs, there were fields left incomplete or illegible. Temporary visitor badges were signed out on the temporary staff log and temporary staff badges were signed out on the temporary visitor log. Additionally, there were staff using the temporary visitor badges and vendors using the temporary staff badges.

**Exception 4:** Internal Audit discovered that currently, the front desk staff are not notified of people who should no longer have access to the building. This becomes a substantial risk if a disgruntled ex-employee came in requesting a temporary staff badge. If the front desk was unaware and unknowingly issue this person a badge; they would have access to secure areas containing confidential information. There was an incident where a staff member was on administrative leave and the front desk staff was not notified. This staff member's relative visited the premises and was given access to secured areas.

**Exception 5:** There is no internal control that ensures that visitor badges are returned at the end of the day, especially since front desk staff departs at 5PM, and sometimes visitors stay after 5PM.

**Recommendations:**

**Recommendation 1:** We recommend that documented procedures be established for duties at the front desk. In addition, these procedures should address issuing temporary visitor and staff badges which include how to determine which visitors receive a temporary visitor badge and which visitors are escorted. Once a procedure is drafted, any and all staff (including temporary staff assigned to the front desk) that may work at the front desk should be properly trained. They should be educated on the key controls for issuing badges and to reduce the risk of badges being taken without signature.

**Recommendation 2:** We recommend that temporary badges be kept in a secured location. Front desk personnel should ensure that the log is completely and legibly filled out. The front desk personnel play a major role in ACERA's daily operations. This area has a large amount of traffic from the public and staff; in our opinion, the safety of employees is vital and these additional steps can go a long way in keeping ACERA secure.

**Recommendation 3:** If a badge is signed out and not returned within 2 business days or reported lost or stolen, the front desk staff should follow up and confirm the status with the individual and notify the PRISM Department, immediately.

**Recommendation 4:** We recommend that ACERA differentiate by design and/or color the difference between visitor badges and staff badges.

**Remediation Plans:**

Owner	Remediation Plans	Remediation Date
PRISM	The Benefits Department is in the process of drafting a communication to All ACERA regarding changes to the process of staff signing out their own temporary badges and entering the reception area space. CSS is writing the operational documentation for the reception area staff.	3 <sup>rd</sup> Qtr 2013
PRISM	Temporary employee badges are Blue and Visitor badges are Red.	2 <sup>nd</sup> Qtr 2013

**CONTROL 4 – PROPER AUTHORIZATION EXISTS FOR ALL PERSONNEL WHO ARE ISSUED KEY CARDS**

**Risk Level - High**

**Audit Results - Partially Effective**

**Control:**

This control confirms that only personnel in good standing or approved third-parties can enter ACERA's secured premises. It also confirms whether badges are returned or deactivated in a timely manner.

**Risk:**

ACERA approves access to unauthorized individuals which leads to security risks protecting organizational assets and increased security risks to staff.

**Owner:**

PRISM/Human Resources

**TEST 1: EXISTENCE OF SECURITY ACCESS FORMS**

All employees, temporary employees and long-term contractors receive the Security Access Card Receipt Form and ACERA's PHYSICAL ACCESS AND SECURITY BADGE POLICY/PROCEDURES after hiring. This form is used for granting initial access to ACERA's facilities. The individual signs the Security Access Card Receipt Form acknowledging their responsibilities for the following:

- **I have read and acknowledged the ACERA Physical Access and Security Badge Policy.**
- **I hereby acknowledge receipt of a security access control card and photo identification badge that will allow me to have access to ACERA.**
- **I accept full responsibility as its holder/user and will return the badge upon termination of my services with ACERA.**
- **In case I lose or misplace this card, I will immediately notify ACERA PRISM - Communication Support Services to deactivate/replace the card.**

The signed form is given to PRISM - Communication Support Services to review and activate the badge. Human Resources Department conducts an employee orientation for new and temporary employees. Afterwards, PRISM – Communication Support Services takes a photo of the individual to include with their new badge. For employees, the Human Resources Department files the signed Security Access Card Receipt Form in their confidential records.

For long-term contractors, the process is the same except the following:

- An employee orientation is not conducted by Human Resources.
- The activated badge is given to the requesting manager by PRISM – Communication Support Services, who then issues to the contractor.
- The signed Security Access Card Receipt form is kept by PRISM – Communication Support Services.

To test the Security Access Card Receipt Form for proper authorization, Internal Audit requested a 2012 list of new employees that were issued security access cards from ACERA's Human Resources Department. We compared the Cardholder Definition Report to this list.

The Security Access Change form is used for changes in access to the building parking garage and ACERA's secured premises for staff, temporary employees and long-term contractors. This form is authorized by the requesting manager. The period of access for long-term contractors is determined by the requesting manager and based on the length of service. After the requesting manager signs the Security Access Change Form, it is sent to the PRISM Department for the PRISM Manager or designee to approve.

### **Test Results:**



When comparing the 2012 list of new employees that were issued security access cards to the Cardholder Definition Report there were no discrepancies. The list of new employees still employed with ACERA had active badges; and, the ones that were no longer employed did not have active badges at the time of the report.

**Exception 1:** We noted that long-term contractors are able to keep their access badges for an indefinite period of time. Our tests revealed active security access badges for long-term contractors who have not performed consistent services for the organization on a regular basis.

### **Recommendations:**

**Recommendation 1:** We recommend that long-term contractors be monitored closely for activity and badges set for a default term of six months, as the maximum term. Based on input from Senior Management, PRISM will decide on the timeframe for contractor badges to remain active.

**Recommendation 2:** We recommend all Security Access Card Receipt for employees, temporary employees and contractors be maintained in Electronic Document Management System (EDMS) with restricted employee access.

### **TEST 2: DEACTIVATION OF BADGES OCCURS TIMELY**

Internal Audit requested 2012 Lost Badge Report forms from PRISM. These forms are completed by personnel when there is a badge that has been permanently misplaced.

### **Test Results:**



**No Sample:** We were notified by PRISM that ACERA did not have any lost badges in 2012. As a result, Internal Audit was unable to perform this test which consisted of comparing the dates on the Lost Badge Report forms to the dates when the security badges were actually deactivated.

**Remediation Plans:**

Owner	Remediation Plans	Remediation Date
PRISM	CSS will keep copies of all signed SECURITY ACCESS CARD RECEIPT FORMS in ACERA's Document Management System.	3 <sup>rd</sup> Qtr 2013

**CONTROL 5 – PHYSICAL CONTROLS FOR ORGANIZATIONAL SECURITY ARE OPERATING EFFECTIVELY****Risk Level - High****Audit Results – In Remediation****Control:**

Key physical controls within ACERA's premises are operating effectively to provide a secure working environment.

**Risk:**

Failure to establish effective physical controls for organizational security could result in theft, vandalism, workplace violence and even loss of life.

**Owner:**

PRISM/Benefits/Human Resources

**TEST 1: DURESS SYSTEMS ARE INSTALLED AND PROPERLY WORKING**

There are two separate duress systems that allow certain staff members to trigger an alarm to alert the agency of potential threats of violence. The first one includes duress buttons installed in the Board/counseling rooms and the second is located in the receptionist area. At the time of the audit, the duress buttons installed in the Board Room/counseling rooms were not operational. No written procedures or training has been provided to staff or the trustees on the process when a threat of violence originates in the Board Room.

Although the current version of the WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES includes a description of the duress system, there are no procedures to instruct staff on what to do if either duress system is activated. The actual system infrastructure is in place but, ACERA Management has held off on instituting the system due to issues with the alarm sound, since there is a concern that a suspect may become agitated in the event of an actual disturbance due to the noise level. In addition, the WORKPLACE VIOLENCE AND EMERGENCY SITUATION PLAN PROCEDURES have included emergency procedures for this system. However, the training of staff has not been initiated since the system has not been activated.

During our audit we observed some issues with the effectiveness of the duress alarm located at receptionist desk. The alarm sound is not very loud and can easily be



mistaken for a sound made by the elevators. In addition, employees who sit in the area of the alarm have not been made aware of the alarm's existence. Therefore, staff does not know what steps to follow after the alarm sounds. And if those few persons in that area are in a meeting or away from their desk, there will be no one to assist the person at the receptionist desk.

#### **Test Results:**



The failure to implement the duress systems clearly increases the organization's security risk. We discovered that one reason for the lack of implementation was that there was no clear ownership indicating which department was responsible for implementing the duress (panic) button procedures. Please note that the Board approved the costs and implementation for the duress systems in 2009. At the time of this audit report, training had not occurred.

Based on input from staff in the Security Access Survey (see Appendix), the implementation of the duress systems is clearly important to the safety of those employees who consult with members in the counseling rooms. Additionally, we had an incident in an ACERA Board Meeting where a member threatened physical violence.

#### **TEST 2: PHYSICAL SECURITY MEASURES ARE OPERATING EFFECTIVELY**

We reviewed security cameras manage by the PRISM Department that are located on the 10<sup>th</sup>, 11<sup>th</sup> and 12<sup>th</sup> floors, which are occupied by ACERA.

#### **Test Results:**



Cameras are positioned to monitor the common area occupied by ACERA on the 10<sup>th</sup>, 11<sup>th</sup>, and 12<sup>th</sup> floors. The security footage can be monitored in the 10<sup>th</sup> floor server room. During business hours the cameras are constantly recording, after hours they switch to motion detection and will activate when motion is detected. The cameras have been placed in key areas throughout the three floors to view people entering and exiting elevators, doors and hallways. All of the floors are adequately covered, with the exception of the 12<sup>th</sup> floor, where there is no camera present to view entry and exit from the elevators. Since, ACERA shares this floor with another tenant; ACERA had not placed cameras in the 12<sup>th</sup> floor common area.

Our audit not did include testing ACERA's physical access doors. During the course of the Security Access Survey, staff members expressed concerns regarding a door on the 11<sup>th</sup> floor. This door had malfunctioned causing a security issue. The door had a tendency to not completely close, allowing non-authorized personnel to possibly gain

access. When we inquired with PRISM Staff, they informed us that the issue had been resolved.

### **Recommendations:**

**Recommendation 1:** We recommend that ACERA make implementing the duress systems for the Board and counseling rooms a top priority. We recognize the concern regarding the noise level, but believe that this issue should be resolved quickly, and the system implemented. Based on Internal Audit's meeting with Senior Management on May 22, 2013, the audible sound for the duress system will remain. The PRISM Department is responsible for the installation of the audible sound. Human Resources will conduct the training on the duress system for staff and Board Members.

**Recommendation 2:** We recommend the establishment of documented procedures on the duress systems. And that management and staff be trained on the proper procedures for the duress buttons in the Board Room, counseling rooms and receptionist desk. We further recommend that the Board Members be made aware of the procedures for the Board Room duress buttons. During the meeting with Senior Management on May 22, 2013, it was agreed that Human Resources would be responsible for conducting training on the duress system for staff and Board Members.

**Recommendation 3:** We recommend that ACERA research additional security measures in the workspace including a better alarm system that can be heard in multiple locations. The lobby area is open to the public and requires stronger controls to protect employees operating in this space. Most employees work in a secured area and are shielded from direct access to the public. From the meeting with Senior Management on May 22, 2013, it was decided that ACERA would research restructuring the front lobby area to improve the safety of staff working in that area.

**Recommendation 4:** We recommend that ACERA request permission from the tenant to install security cameras in the 12<sup>th</sup> floor elevator lobby and common hallways. Security cameras are located in the elevator lobby areas for both the 10<sup>th</sup> and 11<sup>th</sup> floors. The Human Resources Director asked us to investigate whether a security camera can be added to the 12<sup>th</sup> floor lobby (shared with another tenant). PRISM, Human Resources and Investments are located on the 12<sup>th</sup> floor and the safety of staff and security of ACERA's property is crucial. Recently we were informed that the tenant would be open to having a camera in place on the 12<sup>th</sup> floor, but more discussion and a cost/benefit analysis would be recommended.

**Recommendation 5:** We recommend that the ACERA find permanent resolution for malfunctioning doors. We did not test the physical doors throughout ACERA, but an issue with was raised regarding a malfunctioning door in the Security Access Survey.

### Remediation Plans:

Owner	Remediation Plan	Remediation Date
PRISM	The duress system is in place. Changes need to be made to the audible sound. A quote is pending to extend the alarm system to the west side of the 10th floor.	3 <sup>rd</sup> Qtr 2013
Human Resources	Human Resources have established ACERA WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES which includes procedures on the duress systems.	2 <sup>nd</sup> Qtr 2013
Human Resources/PRISM	Human Resources to conduct an information session for ACERA employees.	3 <sup>rd</sup> Qtr 2013
PRISM	ACERA WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES which includes procedures on the duress systems will be provided to the Board.	3 <sup>rd</sup> Qtr 2013
PRISM	ACERA was granted permission from the tenant to install security cameras in the 12th floor elevator lobby and common hallways. Pending ACERA management approval.	2 <sup>nd</sup> Qtr 2013

### CONCLUSION

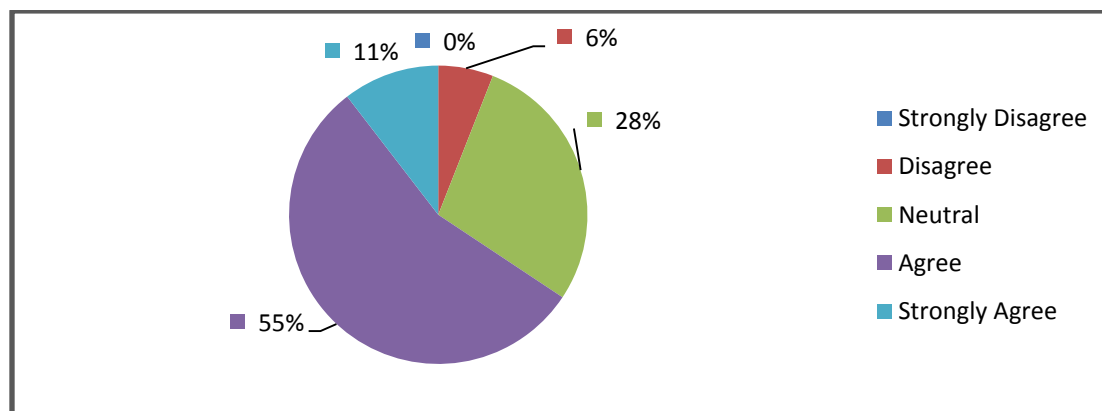
Although the organization has taken major steps to provide organizational security and employee safety, we found the overall results of the audit to show that ACERA's physical security is only **Partially Effective**. It is evident that ACERA recognizes that the safety and security of its employees is important, and has taken certain measures to ensure that staff works in a safe and secure environment. But, the audit results indicate there are clearly areas of concern, mostly around the monitoring and managing the security database and personal security of staff in public areas. Steps have been made to address these issues, but there has not been adequate follow through to ensure the right processes and systems are in place. We believe that the main reason for this is the lack of an owner of the security function. The current shared structure requires a vast amount of coordination between departments. Therefore, Internal Audit recommends that ACERA select a primary coordinator or owner of the security process. It was decided at the May 22, 2013 meeting with Senior Management that PRISM would be the owner of this process. PRISM and Human Resources will work together to coordinate the safety training for all employees.

We are confident that ACERA will make efforts to remediate deficiencies noted in the audit. We were pleased to see that ACERA is adhering to the COUNTY'S WORKPLACE VIOLENCE POLICY; and, ACERA's Human Resources Department is in the process of finalizing the WORKPLACE VIOLENCE AND EMERGENCY SITUATION PROCEDURES for staff.

ACERA also initiated bi-annual mandated Workplace Violence Prevention Training for non-M designated, since previously only M-designated employees were receiving training. ACERA has also established a Crisis Management Team to address major disasters or emergency situations in which normal operations are interrupted.

## APPENDIX - SECURITY SURVEY RESULTS

### 1. I am familiar with the Workplace Violence Prevention Policy in the Staff Information and Employee Handbook.



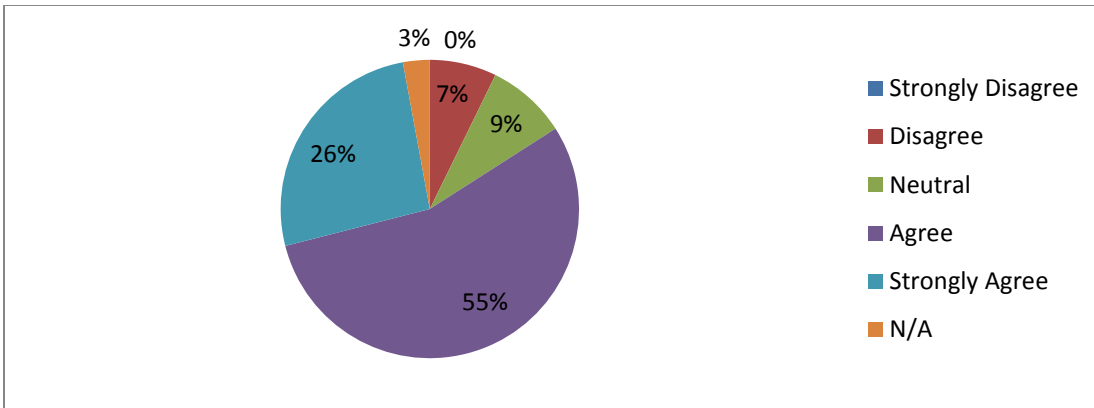
Although close to 66% of the respondents answered they are aware of the ACERA Policy on Workplace Violence, 34% or 1/3 of ACERA staff were not very familiar with the policy and procedures. Based on staff's responses (see below), there is a genuine need for more ACERA specific training.

#### Staff Comments:

- + "ACERA specific education."
- + "Provide workshop, guideline, and training on preventing workplace violence like termination of coworker who works with you. Guidelines on critical process handling like posting of the month end retiree payroll, etc. during civil unrest."
- + "I would suggest training on how to call building security vs. the 911, and in what scenarios you would do one or the other."
- + "Hold regular (annual?) security meetings to educate new staff and to reinforce/remind other staff on both new and old issues."
- + "By sending out an email or maybe having a quick meeting to make sure that all employees know and understand the importance about workplace security."
- + "ACERA should provide more staff training on security. When the Oakland Police spoke, it was very helpful. We should know the procedures to follow when there is workplace violence. We should know which persons to contact."
- + "Educate educate educate! Especially when it comes to being proactive/preventative. E.g., if a staff member suspects another employee is becoming disgruntled, can they approach their supervisor or Human Resources and maintain their anonymity?"

- ✚ “Training should be provided to all staff on a yearly basis and possible drill exercise similar to BCP or fire drill.”
- ✚ “I think it would be helpful if formal training is provided to staff to make aware of workplace violence and how to respond to one.”
- ✚ “Establish procedures.”
- ✚ “Trainings of all EE of ACERA, and review of workplace training every 2-3 years.”

## 2. I feel secure when entering and leaving the building.

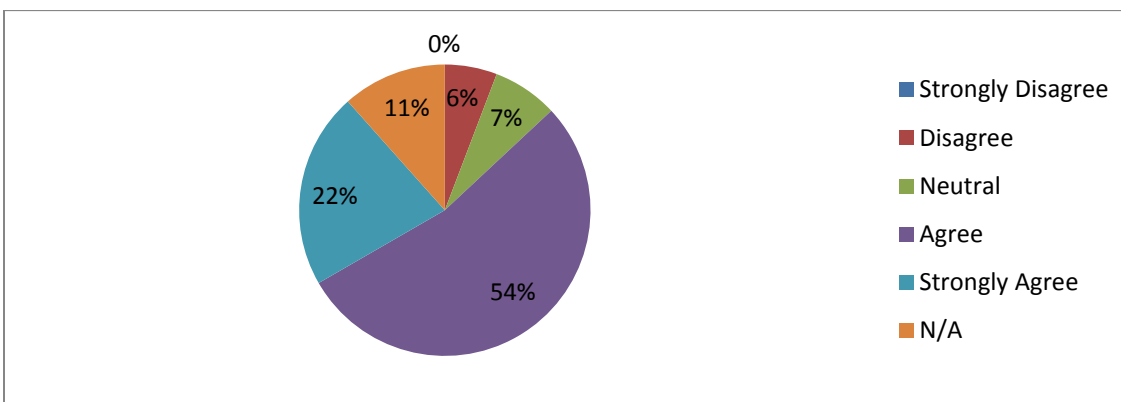


83% of the staff feel secure entering and leaving the building.

### Staff Comments:

- ✚ “My biggest concern is the safety of staff when they leave the office to go to lunch, shop, or walk in downtown.”
- ✚ “I would like to say that I feel pretty secure working here at ACERA. If only I could feel that secure when walking to from my car or the BART!”
- ✚ “I feel that the security measures taken by ACERA and Building Management are really good and effective. If only there was a way to feel that secure when walking to and from my car!”

## 3. I feel secure while in the building before or after working hours.

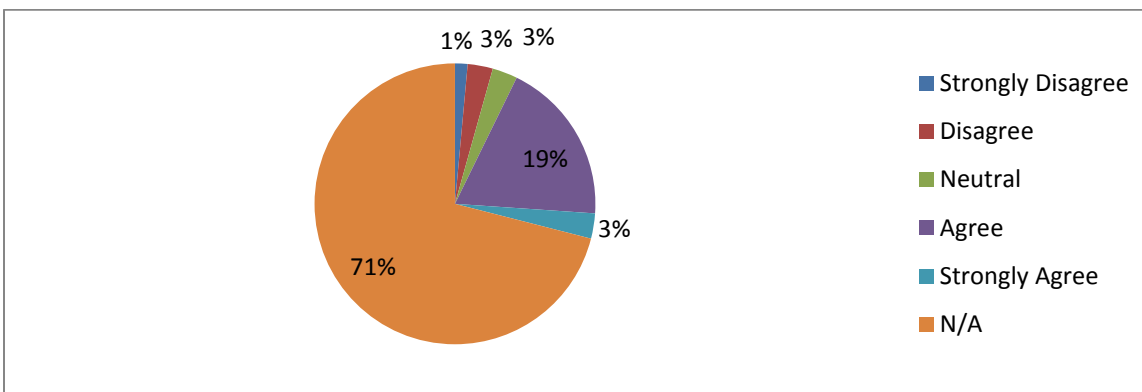


The survey results indicated that 76% of staff felt safe in the building before or after hours. Only 6% of respondents felt unsafe and 7% remained neutral. 11% answered this survey question as non-applicable.

**Staff Comments:**

- ✚ “In my opinion, the primary issues with security involve the areas outside the building, especially after hours. I feel safe within the building.”
- ✚ “I am less worried about violence from another employee and more from somebody from the public. When I work here at night, I feel better if others are here and same with the weekends.”
- ✚ “From what I can see I would say ACERA is very well secured, especially compared to other offices I had visited.”
- ✚ “I have noticed that the lobby security guards are quite helpful at all times.”

**4. I feel secure while working at the reception desk.**

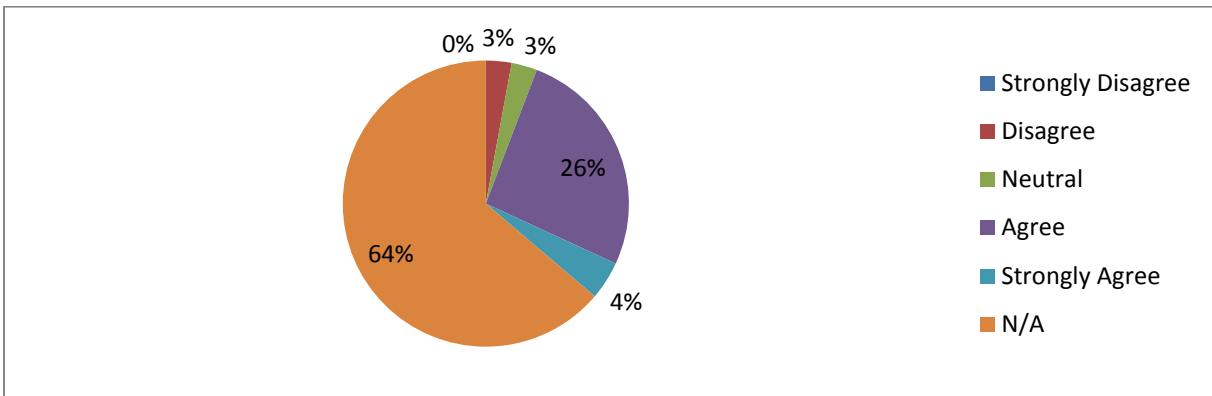


This question surveyed staff who administer the front desk. The survey shows 22% of staff working at the front desk felt safe. Another 4% of staff felt unsafe and 3% remained neutral. The 71% of respondents, who answered “N/A”, represent staff who did not work at the front desk.

**Staff Comments:**

- ✚ “I do not feel secure while working at the receptionist desk because I am unaware of what to do if an emergency does happen, and knowing the public has access to the receptionist area.”
- ✚ “Better emergency support/alert system for the front desk as well as communication re: ex-staff.”
- ✚ “Establish procedure on how to handle a violent or potentially violent situation. Who do we contact if a person is getting extremely angry and emotions are escalating? If a member makes threatening comments or informs us about a potentially dangerous situation (being stalked by someone with weapons, etc), who do we notify and what actions will be taken? Who will be informed about the situation (front desk staff, etc)?”

## 5. I feel secure while meeting with the members in the counseling rooms.

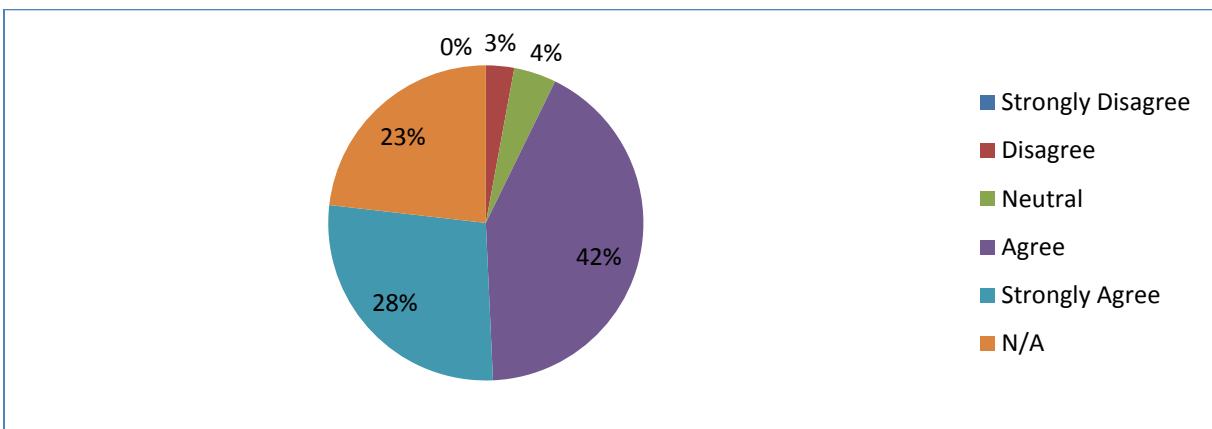


This survey question targeted those Benefit Department staff who work with members in the counseling rooms. Therefore the vast majority of ACERA staff marked “N/A” to this question (64%). The survey showed that of the remaining 36%, 30% of staff working in the counseling rooms felt safe. 3% of respondents felt unsafe and 3% remained neutral.

### Comments:

- ✚ “Duress buttons that work.”
- ✚ “Member came into our office, filed retirement application, and told me that she is victim of domestic violence, that her spouse is stalking her, and that he has weapons. My concerns were more for people at our front desk should spouse come here. Emailed my supervisor and manager about my conversation. Don't know if any concerns were raised or actions taken after I sent my email.”
- ✚ “Another member came into office and talked about the shooting at the cement plant in San Jose. This person had been let go from his employer, he was angry, etc. He said he could relate to how shooter felt, etc. Informed my supervisor about this incident.”

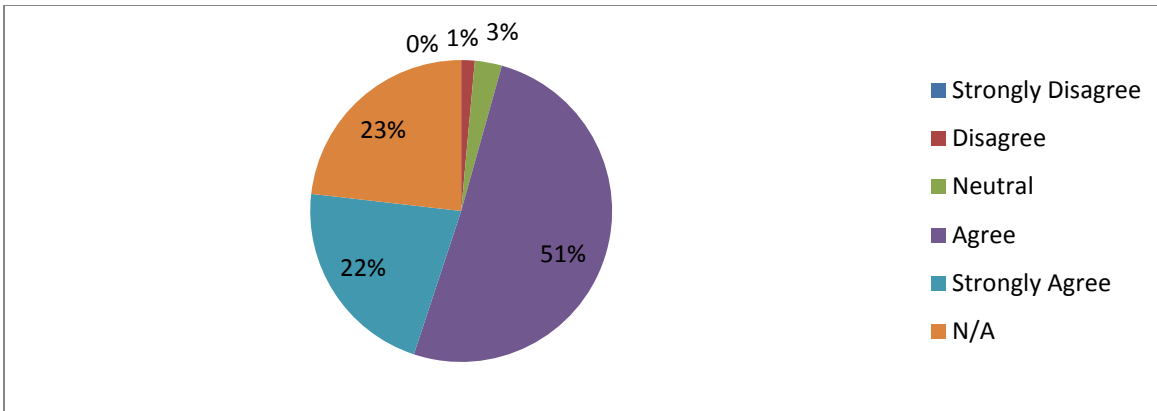
## 6. I feel secure while presenting or providing help in the Training Room.





*The survey show 70% of staff working in the training rooms felt safe. Another 3% of respondents felt unsafe and 4% remained neutral. The 23% represents non-applicable.*

## 7. I feel secure when attending meetings in the Board Room.



*The survey show 73% of staff attending board meeting felt safe. Another 1% of respondents felt unsafe and 3% remained neutral. The 23% represents non-applicable.*

### **Staff Comments:**

- ✚ “During a Board meeting, a member said she would have showed up armed if she had known things were going to go the way they were going.”
- ✚ “I have no initial issue with attending board meetings, but learning that the public is welcomed and it can possibly go south, that is something that should be taken into consideration.”

## 8. Staff experienced a security issue in the workplace.

### **Staff Comments:**

- ✚ “I was scared when there were several large scale civil disobedience in our streets protesting.”
- ✚ “ACERA is a safe place to work.”
- ✚ “No suggestions; I feel safe.”

## 9. What might help you feel more confident about security at ACERA?

### **Staff Comments:**

- ✚ “Policies and procedures and also training and some ACERA specific examples of what to do in various possible situations.”
- ✚ “I work late and weekends from time to time. I feel if violence occurred late, I would close my office door and call the front desk/building lobby and 911.”
- ✚ “Training for all staff on what to do in very specific scenarios such as if a disgruntled employee shows up with a gun, or shows up and pulls the fire alarm so that all the security doors open, or if staff sees a package or bag left behind, or if an explosion occurs, or if someone calls in with a bomb threat, etc. The most effective training

would incorporate roll playing and/or movement so that correct words and actions become ingrained in the body's reflexes, similar to how we do a fire drill.”

- ✚ “Cameras outside elevator on 12th floor.”
- ✚ “Giving all employees options what to do in our areas in case of a workplace violence situation, besides if a fire/earthquake/evacuation situation occurs. I would suggest having an emergency code email/text (phone/email) that warns people of situations in our building/floor, so that we are aware of what is going on, that way we can make the best judgment without a stranger knowing.”
- ✚ “I am secure in dealing with a certain level of confrontation, but I am not secure in dealing with someone who may be violent other than getting help immediately if possible.”
- ✚ “The presence of trained security staff, and more well-thought-out building and office security measures.”
- ✚ “I had worked at the San Francisco California 101 building. After the shooting event, they had installed metal detector to examine everyone entering the building.”